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**EDNY PRO SE OFFICE** 

IN THE UNITED STATES DISTRICT OF NEW YORK

STEVEN GEORGILIS

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

THELAWOFFICES OF AVRUM JROSEMPLUC, FREDSKAMTROW

Individually,

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.) Complaint for a Civil Case

Case V17 58

(to be filled in by the Clerk's Office)

Jury Trial:

✓ Yes □ No (check one)

AZRACK, J.

LOCKE, M. J.

see Below

ALLAM B MENDELSOHN
INDIVIDUALLY,
THE LAW OFFICESOF
DEMNIS J. OSULLIVAN, PC. 9
DEMNIS J. OSULLIVAN
INDIVIDUALLY.

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT ED NY

★ OCT 04 2017

LONG ISLAND OFFICE

# I. The Parties to This Complaint

### A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Steven Georgilis
Street Address	27-40 HOYT AVE SOUTHANTED
City and County	ASTORIA QUEENS
State and Zip Code	NEW YORK 11102
Telephone Number	347-267-0895
E-mail Address	SPARTANSHOGMAIL, COM.

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

# Defendant No. 1

	Name THELAWOFFICE OF APRUMJ. ROSEN, PLUC
	Job or Title
	(if known)
30	Street Address 38 NEW STREET
	City and County , HUNTINGTON - SUFFOCK.
	State and Zip Code NEW YORK, 11743
	Telephone Number 631-423-8527
	E-mail Address FSKANT 20W 60 G-MAIL . COM
	(if known)

### Defendant No. 2

	Name	FR		KANTR		•
	Job or Title	AT	TORNEY	PARTI	YER -	
2	(if known)	0.00	11-12-	-0-1		
	Street Address	38	NEW S	TREET	<u>· · · · · · · · · · · · · · · · · · · </u>	
	City and County	HUN	TINGTOI	y Scel	-FOCK	<u> </u>

	State and Zip Code Telephone Number E-mail Address (if known)	NEW YORK 11743 631-423-8527 FSKANTROW @ GMAILOCOM
		ು ಮೃತ್ತಿಯ ಬರು ಬರು ಹಿಡ್ಡುವು ಕ್ಷೇತ್ರಿಯ ಸ್ಥಾಪ್ ಪ್ರತಿ ಮಾಡುವುದು ಬರು ಬರು ಸ್ಥಾಪ್ ಸ್ಥಾಪ್ ಪ್ರತಿ ಕ್ರೀತ್ರಿಯ ಸ್ಥಿತ್ರಿಯ ಸ್ಥ ಪ್ರಾಪ್ತಿಯ ಪ್ರತಿ ಕ್ರೀತ್ರಿಯ ಸ್ಥಿತ್ರಿಯ ಸ್ಥಿತ್ರಿಯ
Defend	ant No. 3	ALLAN B MENDELSOHNESQ
	Name	FICCIIII .
	Job or Title	PTTOENEY.
	(if known)	22 NOW STREET
*, * * * * * * * * * * * * * * * * * *	Street Address	
a to of	City and County	HUNTINGTON NY 1174-SUFFOLK
	State and Zip Code	N 11743
	Telephone Number	631-923-1625
	E-mail Address	
	(if known)	
Defend	lant No. 4	
	Name	THELAW OFFICE OF DEMNIS J OSULLIVAN PC
	Job or Title	
	(if known)	
	Street Address	210-13 35 AVE
	City and County	BAYSIDE QUEENS
	State and Zip Code	NEWYORK 11361.
	Telephone Number	718-352 7600
	E-mail Address	BrEIFNE@ live. com-
	(if known)	

### II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

Defendant No. 5	2 MAIC I O SULLIVAN ESQ
Name -	LENGTS PARTNER.
Job or Title -	#11000
(if known)	210-13 35 AVE
Street Address	RAYSIDE QUEENS
City and County	NEW YORK ZIOD
State and Zip Code	718-352- TEO
Telephone Number	brciFNEQ LIVE . CD.
E-mail Address (if known)	
Defendant No. 4	
Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address	
(if known)	



What is the basis for fe	ederal court jurisdiction?	(check all that apply)	
Federal ques		☐ Diversity of citize	nship
	s in this section that apply		
	r Jurisdiction Is a Feder		
States Constitu	ic federal statutes, federal tation that are at issue in thi	s case.	y
4245	( CODE 5 198	5-(7) Conse	iracs to interference
Civil Rign	t bluce cha	oter 7 and ch	anter 13 VIOlatio
Commit.	or Jurisdiction Is Diversit	rs Est an Fiking	FFIRMAtions &
		1	
1. The Pl	aintiff(s)		
a. (	The plaintiff is an individual of the State of (name)	TEVEN GEORGE VORK	-K√is a citizen of
b.	If the plaintiff is a corpor		
	The plaintiff, (name) under the laws of the State and has its principal place	e of (name)	, is incorporated, te of (name)
		<del>'-</del> '	
(If mor	re than one plaintiff is nam providing the same informa	ned in the complaint, at ation for each additions	tach an additional al plaintiff.)
pagep	, on any		
2. The D	efendant(s)		
<b>a.</b>	If the defendant is an ind	ividual	
	The defendant, (name) _		, is a citizen of
	the State of (name)		. Or is a citizen of
	(foreign nation)	· · ·	

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a. If the	defendant is ar	inc	lividual	l

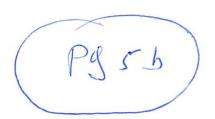
The defendant, (na	me) FRED	S.KA.	TROL	2, is a	citizen o	f
the State of (name)	NEWY	ORK		Or is	a citizen	of
(foreign nation)						

b. If the defendant is a corporation

The defendant, (name)	, is
incorporated under the laws of the	ne State of (name) d has its principal place of
business in the State of (name)	. Or is
business in (name)	



Case 2:17-cv-05825- <b>2</b> MA-S <b>The De</b>	fender(1)1 Filed 10/02/17 Page 7 of 20 PageID #: 7
a.	If the defendant is an individual
	The defendant, (name) ALLAN & MENDELSOLAND a citizen of the State of (name) . HE W. YORK. Or is a citizen of (foreign nation)
b.	If the defendant is a corporation
	The defendant, (name), is incorporated under the laws of the State of (name), and has its principal place of Or is incorporated under the laws of (foreign nation), and has its principal place of
	business in (name).



Case 2:17-cv-05825 <sup>2</sup> JMA- <b>She Deferment</b> 1 Filed 10/02/17 Page 8 of 20 PageID #: 8
a. If the defendant is an individual
The defendant, (name), is a citizen of
the State of (name). Or is a citizen of
(foreign nation)
and the second control of the second control
b. If the defendant is a corporation  Josully Mpe
The defendant, (name) LAW OFFICE OF DENTIL
MEW YORK, and has its principal place of
business in the State of (name) NEW YORK Or is
incorporated under the laws of (foreign nation)
, and has its principal place of
business in (name).



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Case / 17-	に٧-ひわめとカー、ガ۷	A-SiThe Defendant	17 1 E1180 TU/U	1/11/ Page	9 01 70 Page	11 J # 9
O000 -1-1	Q. QQQ_Q Q	TO BOOMING		<i>3</i> = <i>1</i>	0 0. <b>=</b> 0 . ago	

a. If the defendant is an individual

The defendant, (name)	ENNI	SJ	05	su	1614	Ag	is a	ci	tizen o	f
the State of (name)	+ E	w	Ye	or	K	. 0	ris	a.	citizen	of
(foreign nation)			•		_ <del>.</del>					

b. If the defendant is a corporation

The defendant, (name)		, is		
ncorporated under the laws of the St	ate of (na	me)	12	3.6
and ha	s its princ	ipal place	of	
ousiness in the State of (name)	· · · · · · · · · · · · · · · · · · ·	· · · ·	•	Or is
neorporated under the laws of (forei	gn nation	)	100	* .
, and ha	s its princ	ipal place	of	
ousiness in (name)		<b></b> * .	2	



b.	If the defendant is a corporation
	The defendant, (name) LAW OFFICES OF AV, WWW. OSEM PLUC
	incorporated under the laws of the State of (name)
. 4	NEW YORK, and has its principal place of
	business in the State of (name) NEW YORK. Or is
	incorporated under the laws of (foreign nation)
	, and has its principal place of
	business in (name).
(If mo	re than one defendant is named in the complaint, attach an
additi	onal page providing the same information for each additional
defend	
3. The A	amount in Controversy
	a definition of a definition of the definition o
	mount in controversy—the amount the plaintiff claims the defendant
- T - T	or the amount at stake—is more than \$75,000, not counting interest
And the second of the second o	osts of court, because (explain):
\$30	0.500,000, (Thirt I million Five Hendred thousand
DEFENDANT CON	CRIREN ON VIOLATED MY CIVIL RIGHT, FILEN  EN My Right As ADAMYN in terest, and of  CRED, for in The CASE
AFFIRMATION 10 110	no Calae Enginet will ale and ma land
1) the wo	ED me did the appel to the fore for
III. Statement of Claim	Con Kigo A MARGA (4 les est, condo
	CLESITOR IN THE CASE
Write a short and pla	in statement of the claim. Do not make legal arguments. State as
briefly as possible th	e facts showing that each plaintiff is entitled to the damages or other
	now each defendant was involved and what each defendant did that
	narm or violated the plaintiff's rights, including the dates and places
	or conduct. If more than one claim is asserted, number each claim
	I plain statement of each claim in a separate paragraph. Attach
additional pages if no	eeded.
	COO DAA & 1. 11
	SEE 1995 10-16-
	Attacled -

#### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

## V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

# A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where caserelated papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:  $10/\sqrt{2}$ , 20/7

Signature of Plaintiff

Printed Name of Plaintiff

### Statement of claims

42 U.S. Code § 1985 - Conspiracy to interfere with civil rights

(2) OBSTRUCTING JUSTICE; INTIMIDATING PARTY, WITNESS, OR JUROR If two or more persons in any State or Territory conspire to deter, by force, intimidation, or threat, any party or witness in any court of the United States from attending such court, or from testifying to any matter pending therein, freely, fully, and truthfully, or to injure such party or witness in his person or property on account of his having so attended or testified, or to influence the verdict, presentment, or indictment of any grand or petit juror in any such court, or to injure such juror in his person or property on account of any verdict, presentment, or indictment lawfully assented to by him, or of his being or having been such juror; or if two or more persons conspire for the purpose of impeding, hindering, obstructing, or defeating, in any manner, the due course of justice in any State or Territory, with intent to deny to any citizen the equal protection of the laws, or to injure him or his property for lawfully enforcing, or attempting to enforce, the right of any person, or class of persons, to the equal protection of the laws

## Claim 1.

Obstruction of justice 42 U.S. Code § 1985 (2)- Conspiracy to interfere with civil rights.

- 1. On or about 13 December 2014, Shenaz GEORGILIS filed a chapter seven case with eastern district of New York Islip division.
- 2. Dennis J O'Sullivan, the owner of the law offices of Dennis J O'Sullivan, was the Atty. Representing the debtor Shenaz GEORGILIS.
- 3. The case was assigned the index number 14-75498.

- 4. On or about February 9 2015, there was a 341 hearing, at the hearing room, and the Islip bankruptcy courthouse of the above case.
- 5. I Steven GEORGILIS appeared as a creditor at the 341 .hearing.
- 6. The hearing was conducted by the Robert L Pryor the chapter seven trustee, assigned to the case for the U.S. trustee.
- 7. Also present the hearing was the US trustee Alfred Dimino, the debtor Shenaz GEORGILIS, along with an Atty from the office of Dennis J O'Sullivan.
- 8. There was also a representative for Corning Federal credit union, and an Atty. Representing VEHIFAX.
- 9. Both creditors of the estate of Shenaz GEORGILIS.
- 10. I have the transcription of the hearing.
- 11. I will not include this is an exhibit of this time
- 12. I will however certify its contents in this complaint.
- 13. It was at that hearing, that I advised the U.S. trustee Alfred Dimino, that Mr. Prior's law firm, Prior and Mandelup, had appeared, as attorneys representing, one of the creditors in the American made tires bankruptcy case.
- 14. In that same American made tires bankruptcy case, Shenaz GEORGILIS the debtor in this chapter seven case, had given a deed in lieu of foreclosure to Corning Federal credit union, as part of the proceedings.
- 15. The hearing was adjourned by Mr. Pryor, but not before Mr. Pryor, stated on the record, that the 341 hearing would be continued, and I would be allowed to question the debtor Shenaz GEORGILIS.
- 16. Robert L Pryor , was ordered to resign as the trustee the case .
- 17. Allan Mendelsohn was assigned as the trustee to bankruptcy case.
- 18. Fred S. Kantrow, a partner in the firm the local offices of Avrum Rosen PLLC, appeared in all bankruptcy proceedings for the assigned trustee Mendelsohn.
- 19. On or about April March or may 2015, I advised Allan B Mendelsohn, and correspondence that the estate of Shenaz GEORGILIS had claims against Corning Federal credit union and VEHIFAX Corp.
- 20. Steven GEORGILIS was a creditor in the chapter seven case of Shenaz GEORGILIS.

- 21. Steven GEORGILIS, had agreed to indemnify Shenaz GEORGILIS, for losses against Corning Federal credit union and VEHIFAX Corp.
- 22. This was so ordered in a stipulation and order, in the matrimonial case, of Shenaz GEORGILIS vs. Steven GEORGILIS. Signed by the honorable Leslie Purification JSC. On or about the October 15, 2014.
- 23. Upon information and belief, The defendants, Mendelsohn, Kentrow, and Dennis J O'Sullivan, conspired, to deny Steven GEORGILIS as a creditor and as an interested party having rights to insert claims against the creditors of the estate in the chapter seven case of Shenaz GEORGILIS, the right to be heard in the chapter seven case.
- 24. The defendants denied Steven Georgilis the right to bring an action against Corning and VEHIFAX, in this chapter seven case. If
- 25. All the defendants, except Dennis J O'Sullivan appeared before Judge Grossman and his courtroom on June 3<sup>rd</sup> 2015.
  - I have obtained a transcript of the court hearing that took place before Judge Grossman in this court.
  - He is an excerpt from this transcript.

#### APPEARANCES

2 JUNE 3, 2015 3 4 DAVID RASMUSSEN, Attorney for Corning (telephonically) Davidson Fink LLP 5 28 East Main Street Suite 1700 Rochester, NY 14614 7 FRED S. KANTROW The Law Offices of Avrum J. Rosen PLLC 38 New Street 8 Huntington, NY 11743 9 STEVE GEORGILIS, Interested Party 27-40 Hoyt Avenue South 6-D 10 Astoria, NY 11102 11 ALLAN MENDELSOHN, Chapter 7 Trustee 12 Allan B. Mendelsohn, LLP 38 New Street 13 Huntington, NY 11743 14 ALFRED DIMINO, U.S. Trustee Office of the United States Trustee Long Island Federal Courthouse 15 560 Federal Plaza Central Islip, NY 11722 16 17 1 MR. KANTROW: Good morning, Your Honor. 2 The Trustee filed his opposition to the Notice of 3 Removal for exactly the reasons the, the Court has already 4 pointed out. 5 Mr. Georgilis, whether he's the current husband or not 6 of the Debtor, the Debtor chose this venue. She resides in the 7 district. 8 I believe it's the wrong statute that he is seeking,

- 9 probably an inter-transfer to Central, from Central Islip to
- 10 the Division of Brooklyn.
- 11 It's not a removal. The case is already pending in
- 12 the Court. It should be pending in the District Court for the

1	Eastern District of New York.
2	You can't remove to another District Court the
3	Bankruptcy Court being
4	THE COURT: Is he a Creditor in this case?
5	MR. KANTROW: He is not a Creditor in this case.
6	Your Honor, my understanding of this
7	MR. GEORGILIS: I am, Your Honor.
8	THE COURT: Sir, if you open your mouth and talk,
9	unless I ask you to, you're going to have a bigger problem than
10	you can imagine. So just sit there.

I have come to understand that The Bankruptcy Court For The Eastern District Of New York, has several Atty. An Atty. Firms acting as trustees.

I have obtained, from the bankruptcy court's website for the pages listing the list of active trustees

EXHIBIT A OF THIS ALL THE TRUSTEES FOR THE EASTERN DISTRICT OF NEW YORK BANKRUPTCY COURT.

#### ACTIVE CHAPTER SEVEN PANEL TRUSTEES

There are nine trustees listed for the Brooklyn.

They are eight trustees lists for Central Islip.

If the Allan B. Mendelsohn is named as a trustee for the Islip division.

There is also an active chapter 13 standing trustees

And they can be interchanged for Brooklyn and Central Islip. But

I had requested through a motion in the notice of removal, to remove the chapter seven case from Central Islip to Brooklyn.

Allan B. Mendelsohn Fred S. Kantrow, and the law firm of Avrum Rosen, would be losing this case, to Brooklyn, and obviously this case contained a house that could be sold.

The trustee his Atty. Kantrow And Atty. Firm of Avrun Rosen, would be gaining substantial fees.

The auctioneers, and the other parties involved, would also get a carve out.

This case, to chapter seven case of Shenaz GEORGILIS. Was going to stay in Islip.

The defendants Mendelsohn Kentrow and the law offices of Avrum Rosen PLLC, violated the rights of Steven GEORGILIS by filing affidavits and pleadings in

bankruptcy court that were false and frivolous and violation of the bankruptcy code and of the Federal rules of civil procedure rule 11.

These occurrences took place, on or about march 2015, until on or about September 30, 2016.

Defendants Dennis J O'Sullivan, and the law offices of Dennis J O'Sullivan, violated the rights of Steven GEORGILIS by filing affidavits and pleadings in bankruptcy court that were false and frivolous and violation of the bankruptcy code and of the Federal rules of civil procedure rule 11.

These occurrences to place, on or about march 2015, until on or about September 30, 2016.

This case, was ordered, concluded, on September 30, 2016

I have obtained, the certified copy from the bankruptcy court that was sent to all the interested parties and creditors of this chapter seven case.

My name is Steven GEORGILIS and my address appears on the list of creditors as mailed out by the United States bankruptcy court.

I as a result, of the court filings, made by the defendants, my rights have been violated, under 42 U.S. Code § 1985 (2) - Conspiracy to interfere with civil rights.

The relief sought.

I have suffered, and the estate of Shenaz GEORGILIS has suffered the loss of the real property , at 588 Helena drive Hempstead New York, at the present time this property would be worth 600,000 dollars

I and my family has suffered the loss of income from this house going forward, at 30,000 dollars per year for 30 years a loss of \$900,000 in lost income.

I have suffered the loss of rights to pursue my claims against the creditors of the estate of Shenaz GEORGILIS,

I had claims and the estate of Shenaz GEORGILIS had against Corning amounting to more than \$8,000,000 (eight million dollars),

I individually as well as the estate of Shenaz GEORGILIS, and claims, against VEHIFAX Corp., Amounting to more than 6,000,000 (six million dollars).

I am entitled punitive, damages of \$15,000,000 due to the heinous crimes and conspiracy, committed against me by the chosen trustee Allan B. Mendelsohn and the attorneys representing him in bankruptcy court.

I have lost , three years of my life prosecuting this set of miscreant attorneys, who having taken an oath to follow in the Law ,In this case the Federal rules of civil procedure rule 11 and the laws under 11 USC the bankruptcy code, ,filed more then 15, briefs , in the courtroom of judge Grossman and attested in this briefs , that they well telling the truth under the penalties of perjury,